

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

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**IN RE: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION**

MDL No. 2:18-mn-2873-RMG

**This Document relates to  
ALL CASES**

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**JOINT MOTION TO DEFER PROCEEDINGS FOR CASES INVOLVING  
HIGH CHOLESTEROL OR PREGNANCY-INDUCED HYPERTENSION**

Pursuant to DSC Local Civil Rule 7.01, Co-Lead Counsel for Plaintiffs and Defendants respectfully move this Court to enter the attached proposed order (Exhibit A) deferring further proceedings for claims involving high cholesterol or pregnancy-induced hypertension until a later time. The motion is based on the following grounds:

1. In Second Amended CMO 28 (Dkt. 4985), the Court instructed the parties to meet and confer on cases involving the two injuries not addressed in CMO 26, high cholesterol and pregnancy-induced hypertension, and to submit to the Court either a joint proposed order addressing these two conditions or, if unable to agree, competing proposals. On September 4, 2024, the Court ordered the parties to submit such joint proposed order or competing proposals within 10 days of the Court's order (Dkt. 5918).
2. Co-Lead Counsel have met and conferred regarding claims involving these two additional injuries and collectively all agree that at the present time the resources of the Court and the parties are best directed to the existing personal injury bellwether cases and that the Court should continue to defer further proceedings for claims involving high cholesterol or

pregnancy-induced hypertension, subject to further review by the Court and the parties at a later time.

Wherefore, Co-Lead Counsel for Plaintiffs and Defendants respectfully request that the Court enter the attached proposed order deferring further proceedings for claims involving high cholesterol or pregnancy-induced hypertension until a later time.

Dated: September 12, 2024

Respectfully submitted,

By: /s/ Amanda S. Kitts

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